

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
Robert E. Tocheny	:	Chapter 13
Dina M. Tocheny,	:	Bankruptcy No. 15-16727 REF
	:	
Debtors	:	

**MOTION FOR ORDER CONVERTING CHAPTER 13 CASE
TO A CASE UNDER CHAPTER 7**

Robert E. Tocheny and Dina M. Tocheny the above Debtors, move for an order converting this case from a case under Chapter 13 to a case under Chapter 7 of the Bankruptcy Code, and would show the Court the following:

1. The Debtors filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on September 15, 2015.
2. Debtors are eligible to be debtors under Chapter 7 of the Bankruptcy Code and desire to convert this case to a case under Chapter 7 pursuant to § 1307(a).
3. This case was not converted from a case under any chapter of Title 11, United States Code.

WHEREFORE, Debtors pray for an order converting this case from a case under Chapter 13 to a case under chapter 7.

Dated: August 22, 2017

s/ Robert E. Tocheny
Robert E. Tocheny

Dated: August 22, 2017

s/ Dina M. Tocheny
Dina M. Tocheny

Dated: August 22, 2017

s/ David S. Gellert
David S. Gellert, Esquire
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